



September 13, 2004

Jim Christiansen
EPA Region VIII
999 18th St., Suite 300
Denver, CO 80202

RE: Libby Railyard Biotite Removal, Libby, Montana
EMR Project No. 5539.004
September 10, 2004 Weekly Progress Report

Dear Mr. Christiansen,

Per the Administrative Order on Consent for Removal, the following is the Weekly Progress Report submitted by EMR, Inc. (EMR) on behalf the Burlington Northern and Santa Fe Railway Company (BNSF)-for the Libby Railyard, Montana, Libby Asbestos Site, Libby Montana. In addition to this report, EMR will also be responsible for the required monthly report on this project through the close of this project.

CURRENT WEEK'S ACTIVITIES

MRS and Envirocon personnel completed demarcation of the exclusion zone (EZ) with fence, rope, and signage. Improvements to the truck decontamination pad were completed and the office trailer was placed on site.

Montana Railroad Services, Inc. (MRS) completed removal of bolts and spikes for the section of rail scheduled for removal in this phase; this includes areas of tracks 2, 3, and 4 at the east end of the site. MRS began rail removal and decontaminated the rail and other track material (OTM) on site. Upon completion of decontamination of the steel portions of the track and OTM, a visual inspection was conducted and MRS began transporting decontaminated rail and OTM off site.

Envirocon, Inc. (Envirocon) has begun removal of railroad ties and is stacking them on site. Envirocon began soil excavation at the east end of the site and shipped one truck to the Lincoln County Landfill on Friday, September 10, 2004; this truck was shipped under manifest number BNSF001 and contained approximately eight (8) cubic yards of soils.

Air samples are being collected daily. Personal samples are being analyzed by a combination of Phase Contrast Microscopy (Method 7400, Issue 2) and Transmission Electron Microscopy (TEM) AHERA method. Area samples are being analyzed by TEM AHERA Method. Preliminary laboratory results for TEM samples are being submitted to the USEPA and Volpe via facsimile upon receipt by EMR in Minneapolis, Minnesota. No final copies have been received as of the date of this letter. Final laboratory data will be submitted in hard copy form in the weekly report once received.

Kennedy/Jenks, EPA, and CDM personnel met on Friday, September 10, 2004 to discuss landfill schedules.

Additional investigation samples were collected at the west end of the site. These samples were submitted for analysis by Polarized Light Microscopy (PLM) method 9002, Issue 2 (9002) and PLM - VE analysis. Preliminary data has been received by EMR for the PLM -9002 analysis; sample results for the VE analysis have not been received. No final copies of soil analytical data collected last week has been received. Three composite samples were analyzed. Two samples had detections of Libby Amphibole (LA) at concentrations less than one percent (1%); the other sample did not contain LA above the detection limit. A site sketch will be included upon receipt of the final copy from the laboratory.

PROBLEMS ENCOUNTERED

No problems have been encountered to date.

ACTIVITIES PLANNED FOR NEXT TWO WEEKS

Rail removal will be completed along tracks 1, 2, 3, and 4 at the east end. Removed track and OTM will be decontaminated and transported off site. Envirocon will continue removing railroad ties working from the east end of the site; they anticipate that they will set up the railroad tie decontamination conveyor on site during the week of September 20, 2004. Soil excavation will continue from the east end of the site and soils will be transported to Lincoln County Landfill.

If you have any questions or require further explanation concerning the above information, please call Tanya Drake of EMR at (763) 277-5200, Chuck Soule of Kennedy/Jenks Consultants at (253) 874-0555, or David Smith of BNSF at (406) 447-2307.

Sincerely,
EMR, Inc.



Tanya Drake
Project Coordinator

cc: Mr. David Smith, BNSF Manager Environmental Remediation, Helena, Montana
Mr. Dave Diem, Kennedy/Jenks Consultants, Libby, Montana
Mr. Chuck Soule, Kennedy/Jenks Consultants, Federal Way, Washington
Ms. Courtney Zamora, Volpe Federal Programs, Libby, Montana